

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

MRI SOFTWARE LLC,)	CASE NO.: 1:12-cv-01082
)	
Plaintiff,)	
)	JUDGE: Christopher A. Boyko
vs.)	
)	
LYNX SYSTEMS, INC.,)	
)	
Defendant.)	
)	

**PLAINTIFF'S MOTION FOR LEAVE TO FILE DECLARATION OF GEORGIA
YANCHAR UNDER SEAL**

Pursuant to Local Rule 5.2, Plaintiff, MRI Software LLC (“MRI”), respectfully moves this Court for leave to file the March 4, 2013 Declaration of Georgia Yanchar, and the Exhibits thereto, under seal. MRI wishes to submit the foregoing in support of MRI’s Reply Memorandum in Support of its Motion to Show Cause Why Defendant Should Not Be Held in Contempt of the November 9, 2012 Injunction Order.

This motion to seal is submitted for good cause. The March 4, 2013 Declaration of Georgia Yanchar, and the exhibits thereto, contain sensitive business information, including lists that identify, by name, the “Master Agreement Signatories” referenced in the November 9, 2012 Stipulated Injunction Order, and previously identified to Lynx. These lists constitute extremely valuable and sensitive information of MRI. In addition, the Declaration references, and attaches, client communications which identify, by name, Master Agreement Signatories, to whom Lynx has provided services, and describe the services provided by Lynx. This information is also valuable and sensitive information of MRI and/or its clients. These documents rebut the arguments made in Lynx’s Opposition to MRI’s Motion to Show Cause.

Defendant will not be prejudiced by the sealing of the declaration, because the declaration will be served, via email, upon Defendant's counsel of record, pursuant to the Protective Order entered in this case, concurrently with the serving of MRI's Reply Memorandum.

Accordingly, MRI respectfully requests that the Court enter an Order granting MRI leave to file under seal the March 4, 2013 Declaration of Georgia Yanchar.

March 4, 2013

Respectfully submitted,

By: /s/ Georgia Yanchar

Daniel McMullen (Ohio Bar No. 0034380)

Georgia Yanchar (Ohio Bar No. 0071458)

CALFEE, HALTER & GRISWOLD LLP

The Calfee Building

1405 East Sixth Street

Cleveland, Ohio 44114-1607

Telephone: (216) 622-8200

Facsimile: (216) 241-0816

E-mail:dmcullen@calfee.com

gyanchar@calfee.com

Attorneys for Plaintiff MRI Software LLC

CERTIFICATE OF SERVICE

I hereby certify that on March 4, 2013 a true and correct copy of the foregoing was filed electronically with the Court using the CM/ECF system. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt and parties may access this filing through the Court's System.

/s/ Georgia E. Yanchar
One of the Attorneys for Plaintiff